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1 Whereas, plaintiff noticed the deposition of defendant Karl Wen for January 26, 2006;
2 noticed a half-day deposition of Mark Kao for January 25, 2006; noticed a half-day deposition of
3 the person most knowledgeable about defendant's business from 1996 until the present and about
4 the closure of the Sheng Kee restaurant at which plaintiff worked, for January 25, 2006; noticed a
5 half-day deposition of Wei-Jun (Rebecca) Zhao for February 2, 2006; and noticed a half-day
6 deposition of Hoi Yin (Iris) Wat for February 3, 2006;

7
8 Whereas, defendant noticed the deposition of plaintiff Hong Lu for February 1, 2006;

9 Whereas, plaintiff propounded her first set of interrogatories and requests for production of
10 documents on December 2, 2006;

11 Whereas, the deadline for serving defendant's responses to plaintiff's first requests for
12 production of documents and first set of interrogatories was January 6, 2006;

13 Whereas, defendant served its responses to plaintiff's discovery by mail on January 4, 2006,
14 but not its responsive documents;

15 Whereas, plaintiff sent letters to defendant's counsel on January 10 and January 13, 2006
16 regarding the missing responsive documents;

17 Whereas, defendant's counsel responded to the January 10 letter in an e-mail dated January
18 10, and to the January 13 letter by calling plaintiff's counsel on the next business day and by
19 serving its documents by overnight mail;

20 Whereas, defendant served its responsive documents by overnight mail on January 17, 2006;

21 Whereas, plaintiff did not receive defendant's responsive documents until January 19, 2006;

22
23 Whereas, plaintiff's counsel informed defendant's counsel by letter on January 20, 2006 that
24 because of the inadequacy of defendant's responsive documents, plaintiff would be unable to
25 proceed with the depositions of defendant Karl Wen, Mark Kao, and the person most
26 knowledgeable about defendant's business from 1996 until the present and about the closure of
27 the Sheng Kee restaurant at which plaintiff worked;

28
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1 Whereas, defendant propounded its first set of interrogatories and requests for production on
2 December 16, 2005;

3 Whereas, the deadline for serving plaintiff's responses to defendant's first set of
4 interrogatories and requests for production of documents was January 17, 2006;

5 Whereas, plaintiff served her responses to defendant's discovery by mail on January 17,
6 2006, but not her responsive documents;

7 Whereas, plaintiff's counsel informed defendant's counsel by letter on January 17, 2006 that
8 because plaintiff had not yet received defendant's responsive documents, plaintiff was not in a
9 position to produce her responsive documents;

10
11 Whereas, plaintiff served her responsive documents by mail on January 20, 2006;

12 Whereas, defendant did not receive plaintiff's responsive documents until January 23, 2006;

13 Whereas, the parties met and conferred regarding the adequacy of defendant's responsive
14 documents on January 23, 2006;

15 Whereas, the parties agreed that the depositions of defendant Karl Wen, plaintiff Hong Lu,
16 Mark Kao, and the person most knowledgeable about defendant's business from 1996 until the
17 present and about the closure of the Sheng Kee restaurant at which plaintiff worked, would have
18 to be postponed;

19 Whereas, defendant produced additional responsive documents on January 23, 2006;

20
21 Whereas, plaintiff sent a meet and confer letter to defendant regarding the adequacy of
22 defendant's responsive documents on January 25, 2006;

23 Whereas, plaintiff's counsel informed defendant on January 26, 2006 that the deposition of
24 Hei-Yin (Iris) Wat, scheduled for February 3, 2006, would be canceled;

25 Whereas, the other subpoenaed deponent, Wei-Jun (Rebecca) Zhao, did not appear at her
26 scheduled deposition on February 2, 2006;

27 Whereas, plaintiff sent a meet and confer letter to defendant regarding the adequacy of
28 defendant's responses to plaintiff's first set of interrogatories on January 31, 2006;

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NO. 150 0006

1 Whereas, the parties met and conferred on February 2, 2006, and defendant agreed to produce
2 additional documents by February 10, 2006;

3 Whereas, the parties seek to engage in meaningful mediation of this case;

4 Whereas, the parties agree that they will not be able to conduct depositions and prepare for
5 mediation by February 28, 2006;

6 Whereas, the parties agree that the mediation originally scheduled for February 28, 2006 will
7 have to be postponed;

8 Whereas, the parties have notified mediator Barry Winograd that the parties will be unable to
9 attend mediation on February 28, 2006;

10 Whereas, the earliest date available for mediation with Mr. Winograd on which all parties are
11 available is May 4, 2006;

12 Whereas, the parties have agreed to reschedule the mediation in this case to May 4, 2006;

13 Whereas, the Court previously ordered that a further case management conference be held on
14 March 21, 2006, and that an updated joint case management conference statement be filed no
15 later than March 14, 2006;

16
17 THEREFORE, the parties request that (1) the mediation date be extended until May 4, 2006,
18 and that (2) the dates for the further case management conference and the filing of an updated
19 joint case management conference statement be extended accordingly.

20 IT IS SO STIPULATED.

21
22 Dated: February 10, 2006

23 Patricia A. Shiu
24 Elizabeth Kristen
25 Sharon Terman
26 THE LEGAL AID SOCIETY
27 EMPLOYMENT LAW CENTER

28 By:

29 Sharon Terman
Sharon Terman

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Attorney for Plaintiff
HONG LU

William Kwong
Ai Mori
MINAMI, LEW & TAMAKI, LLP

By:


William Kwong

Attorney for Defendants
Sheng Kee Bakery & Café and Karl Wen

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1 Pursuant to General Order No. 45 X. (B), I attest that concurrence in the filing of this document
2 has been obtained from Defendant's counsel.
3

4 Dated: February 10, 2006

5 Patricia A. Shiu
6 Elizabeth Kristen
7 Sharon Terman
8 THE LEGAL AID SOCIETY
9 EMPLOYMENT LAW CENTER

10 By:

11 Sharon Terman
12 Sharon Terman

13 Attorney for Plaintiff
14 HONG LU
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NO. 150 0009

ORDER

Mediation in this matter is hereby extended until May 4, 2006. The Court hereby extends the case management conference date to May 23, 2006 at 3:00 p.m., and the date by which the parties shall file an updated joint case management conference statement to May 16, 2006.

Pursuant to stipulation, IT IS SO ORDERED.

Dated: February 14, 2006



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